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Attorneys for Motors Liquidation  
Company GUC Trust

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

|   |   |
|---|---|
| -----X  |   |
|   | : |
| <b>In re</b>                                      | : |
|   | : |
| <b>MOTORS LIQUIDATION COMPANY, <i>et al.</i>,</b> | : |
| <b>f/k/a General Motors Corp., <i>et al.</i></b>  | : |
|   | : |
| <b>Debtors.</b>                                   | : |
|   | : |
| -----X  |   |

**Chapter 11 Case No.**

**09-50026 (REG)**

**(Jointly Administered)**

**NOTICE OF PRESENTMENT OF PROPOSED ORDER  
GRANTING DEBTORS' OBJECTION TO PROOFS OF  
CLAIM NOS. 18839 AND 70846 FILED BY JUANITA PICKETT**

**PLEASE TAKE NOTICE** that, the Motors Liquidation Company GUC Trust (the "**GUC Trust**"), formed by the above-captioned debtors (collectively, the "**Debtors**") in connection with the Debtors' Second Amended Joint Chapter 11 Plan dated March 18, 2011, will present the attached Order granting the GUC Trusts' Objection to Proofs of Claim No. 18839 and Administrative Claim No. 70846 filed by Juanita Pickett (the "**Proposed Order**") to the Honorable Robert E. Gerber, United States Bankruptcy Judge, for signature on **May 30, 2012 at 12:00 noon (Eastern Time)**.

**PLEASE TAKE FURTHER NOTICE** that objections, if any, to the Proposed Order must be made in writing and received (i) in the Bankruptcy Judge's chambers at the United States Bankruptcy Court for the Southern District of New York, One Bowling Green,

New York, New York 10004 and (ii) by Dickstein Shapiro LLP, attorneys for the GUC Trust, 1633 Broadway, New York, New York 10019 (Attn: Stefanie Birbrower Greer, Esq., and Barry N. Seidel, Esq.), not later than **May 30, 2012 at 11:30 a.m. (Eastern)**. Notwithstanding the receipt of any such objections, the GUC Trust may submit the Proposed Order to the Bankruptcy Court, which may be entered with no further notice or opportunity to be heard to any party.

Dated: New York, New York  
May 17, 2012

/s/ Stefanie Birbrower Greer  
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|   | : |
| <b>Debtors.</b>                                   | : |
|   | : |
| -----X  |   |

Chapter 11 Case No.

09-50026 (REG)

(Jointly Administered)

**ORDER GRANTING OBJECTION TO PROOFS OF  
CLAIM NOS. 18839 AND 70846 FILED BY JUANITA PICKETT**

Upon the Objection to Proof of Claim Number 18839 and Administrative Claim Number 70846 (the “**Claims**”) dated April 12, 2012 (the “**Objection**”) (ECF. No. 11585), of the Motors Liquidation Company GUC Trust (the “**GUC Trust**”), formed by the above-captioned debtors (collectively, the “**Debtors**”) in connection with the Debtors’ Second Amended Joint Chapter 11 Plan, dated March 18, 2011 (as may be amended, supplemented, or modified from time to time, the “**Plan**”), pursuant to section 502(b) of title 11, United States Code (the “**Bankruptcy Code**”), seeking entry of an order disallowing and expunging the Claims on the basis that such claims are time-barred by any applicable statutes of limitations, as more fully described in the Objection; and due and proper notice of the Objection having been provided, and it appearing that no other or further notice need be provided; and the Court at the hearing on the Objection on May 15, 2012 (the “**Hearing**”) having found and determined that the relief sought in the Objection is in the best interests of the Debtors, their estates, creditors, and all parties in interest and that the legal and factual bases set forth in the Objection establish just cause for the relief granted herein; and upon the record, including findings of fact and

conclusions of law set forth by this Court at the Hearing; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the relief requested in the Objection is granted; and it is further

ORDERED that, pursuant to section 502(b) of the Bankruptcy Code, the Claim is disallowed and expunged; and it is further

ORDERED that the time to appeal runs from the date this order is entered; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: New York, New York  
\_\_\_\_\_, 2012

\_\_\_\_\_  
United States Bankruptcy Judge